

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

YOOSUN KOH (NYBN 5245220)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7034
FAX: (415) 436-7234
Yoosun.Koh@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 21-00125 RS
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE CHANGE OF
v.)	PLEA HEARING TO OCTOBER 25, 2021 AND
)	EXCLUDE TIME UNDER THE SPEEDY TRIAL
JONAE DICKSON,)	ACT FROM AUGUST 17, 2021 TO OCTOBER 25,
)	2021, AND ORDER
Defendant.)	
)	

A change of plea hearing is set for August 17, 2021 in the above-captioned case. Counsel for the United States and counsel for the defendant Jonae Dickson request that the change of plea hearing be continued to October 25, 2021 at 2:00 p.m. and that time be excluded under the Speedy Trial Act from August 17, 2021 through October 25, 2021.

In early July 2021, defense counsel was involved in an accident and sustained serious injuries that required hospitalization. He requires additional time to recover and is unavailable for the change of plea hearing currently scheduled for August 17, 2021. For this reason, and because defense counsel needs additional time to review discovery and possible defenses with the defendant, the parties stipulate and agree that the change of plea hearing date be continued to October 25, 2021, and that excluding time

from August 17, 2021 through October 25, 2021 will allow for continuity of counsel and effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 17, 2021 through October 25, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: August 6, 2021

/s/
YOOSUN KOH
Assistant United States Attorney

DATED: August 6, 2021

/s/
GREGOR GUY-SMITH
Counsel for Defendant Jonae Dickson

ORDER

The change of plea hearing set for August 17, 2021 is continued to October 25, 2021 at 2:00 p.m. and, based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from August 17, 2021 through October 25, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for continuity of counsel and effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from August 17, 2021 to October 25, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from August 17, 2021 through October 25, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: August 6, 2021


HON. RICHARD SEEBORG
Chief U.S. District Judge